

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

THE UNIVERSITY OF)
NORTHERN VIRGINIA, INC.)
)
)
Plaintiff,)
v.)
)
ACCREDITING COUNCIL FOR)
INDEPENDENT COLLEGES AND)
SCHOOLS)
)
)
Defendant.)
)

Civil Action No. 1:07cv1057

MOTION TO EXTEND TIME

Plaintiff, The University of Northern Virginia ("UNVA"), by counsel, hereby moves for an extension of time in which to post a cash bond for the preliminary injunction granted by the Court at a hearing on November 6, 2007, so that the written order granting the preliminary injunction can be entered, and in further support of this motion states as follows:

1. On November 6, 2007, this Court heard arguments on UNVA's preliminary injunction motion. At the conclusion of the hearing, in a ruling from the bench, the Court granted UNVA's preliminary injunction motion and ordered that UNVA post a cash or surety bond in the sum of \$75,000 by November 13, 2007. The Court requested that the parties present an order reflecting the Court's ruling.
2. On November 9, 2007, UNVA, by counsel, electronically filed an order, endorsed by counsel for both parties, and sent the originally endorsed order to Judicial Chambers in Norfolk, Virginia for entry.
3. UNVA is prepared to post a cash bond in the amount of \$75,000, and has delivered a check for that sum to its undersigned counsel. Counsel has been advised by the Clerk's Office

that the Clerk will not accept a preliminary injunction bond until an order is entered. As of the time of filing this motion, UNVA has not received notification of entry of the order endorsed by the parties.

4. The undersigned counsel contacted counsel for the Defendant advising of their intent to file this motion for an extension and, as reflected by the endorsement of counsel hereon, Defendant consents to this motion.

WHEREFORE, UNVA respectfully requests that the Court enter the attached order extending the time in which Plaintiff has to file a cash or surety bond for a period within 24 hours following entry of the Preliminary Injunction Order.

THE UNIVERSITY OF NORTHERN VIRGINIA

By: _____ /s/
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SEEN AND AGREED:

/s/
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Counsel for Defendant
Accrediting Council of Independent Colleges and Schools

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was consented to by undersigned counsel and served through the Court's electronic filing system this 13th day of November, 2007 to:

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